



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

See it - do it
MEMORANDUM

CC-K3VANER, Aeronautics

DATE August 5, 1985

TO DWPC-FOS-Permits

FROM A G Taylor AGT

SUBJECT Hazardous Waste Interpretation

Attached for your information is a recent interpretative memorandum generated by USEPA's Office of Solid Waste regarding rinsewaters from the washing of exteriors of airplanes used for pesticide application.

The effect of this memo on the status of rinsewaters from washing ground spray equipment still needs to be clarified.

AGT ma

cc R Kanerva

EPA Region 5 Records Ctr



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listing commercial chemical products, EPA intended to cover those products which, for various reasons, are thrown away. Id. The Agency did not intend to cover those cases, as here, when the chemical is released into the environment as a result of use. Unless we take such a position, one could argue that the pesticide that is sprayed that does not fall directly on the crop (but falls on the ground next to the crop) would be disposal of an unused commercial chemical product; such an interpretation is a distortion of the commercial chemical product rule.

Consequently, we are withdrawing our previous interpretation that airplane washing rinsewater is a hazardous waste via the mixture rule.^{1/} Rather, this rinsewater would be defined as hazardous only if it exhibits one or more of the characteristics identified in Subpart C of Part 361.

Should you have any further questions concerning this matter, please contact Matthew A. Straus of my staff on (202) 475-8551.

cc: Air & Water Management Division Directors (I, L, P and W/T as 1)
Air & Waste Management Branch Chief (I-W)

S. Schatzow

P. Gray

R. Shantz

B. Weddle

J. Lehman

^{1/} It should be noted that the remainder of the regulatory interpretations discussed in the June 16, 1982 memorandum are still appropriate and should be considered valid.